IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

WOODBRIDGE GROUP OF COMPANIES, LLC, et al., 1

Remaining Debtors.

MICHAEL GOLDBERG, in his capacity as Liquidating Trustee of the WOODBRIDGE LIQUIDATION TRUST,

Plaintiff,

v.

ANDREW R. VARA, in his capacity as the United States Trustee for Region 3; RAMONA D. ELLIOTT, in her capacity as Acting Director of the United States Trustee Program; and THE UNITED STATES TRUSTEE PROGRAM,

Defendants.

Chapter 11

Case No. 17-12560 (JKS)

Adversary No. 22-50516 (JKS)

CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING STIPULATION FOR EXTENSION OF TIME

The undersigned counsel to the above-captioned defendants (the "<u>Defendants</u>") hereby certifies as follows:

¹ On February 25, 2019, the Court entered an order closing the Bankruptcy Cases of all Debtors except Woodbridge Group of Companies, LLC and Woodbridge Mortgage Investment Fund 1, LLC (together, the "Remaining Debtors"). The Remaining Debtors' Bankruptcy Cases are being jointly administered under Case No. 17-12560 (KJC). The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors' mailing address is 14140 Ventura Boulevard, #302, Sherman Oaks, California 91423.

- 1. On December 29, 2022, the above-captioned plaintiff (the "<u>Plaintiff</u>") commenced the above-captioned adversary proceeding by filing a complaint (the "<u>Complaint</u>") against the Defendants (together with the Plaintiff, the "<u>Parties</u>").
- 2. The Parties have agreed to extend the time within which the Defendants must answer, move or otherwise respond to the Complaint to and including March 10, 2023. The Parties have entered into a *Stipulation for Extension of Time* (the "<u>Stipulation</u>").
- 3. The Defendants respectfully request that the Court enter the proposed order attached hereto as **Exhibit A** approving the Stipulation, which is attached to the proposed order as Exhibit 1, at its earliest convenience.

Dated: January 23, 2023 Wilmington, Delaware

Respectfully submitted,

By: /s/ Timothy J. Fox
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